EN-WM-300: Rev. 11/93 Part A

Date of Inspection

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

6/17/96 Time start \_\_\_\_\_ Time finish \_\_\_\_\_

| Traine of mispector                      | CIU IGEV COST        | ·                  |                     |                      |
|--|----------------------|--------------------|---------------------|----------------------|
| Company, installation na                 |                      | l                  |                     |                      |
| Location 3451 W                          | allut St. Phil       | a PA 19104         |                     |                      |
| County Phila                             |                      | Municipality       | Phila               |                      |
| Identification number                    | - CO CO CO CO        | PAD042250          | 5712                |                      |
| Name of responsible offi                 | cial Kyle Ros        | ato                |                     |                      |
| Title Indus                              |                      |                    |                     |                      |
| Mailing Address <u>DEHS</u>              | 1408 Blockley        | Hall Phila         | PA 19104-60         | ્રા                  |
| Area code and telephone                  | ,                    |                    |                     |                      |
| Name of person interview                 |                      | 1                  |                     |                      |
| Title                                    |                      | NME                |                     |                      |
| Mailing address (if differ               |                      | All                |                     |                      |
| Area code and telephone                  | 1                    |                    |                     |                      |
| •  |                      |                    |                     |                      |
| <ol> <li>Current waste hand</li> </ol>   | •                    |                    |                     | _                    |
| a. 🔲 On-site                             | ☐ treatment,         | ☐ storage,         | disposal            | ☐ PBR                |
| b. 🔲 On-site                             | use,                 | reuse,             | recycle,            | ☐ reclaim            |
| c. 🛮 Off-site                            | ☐ treatment,         | storage,           | ☑disposal           |                      |
| d. 🔀 Off-site                            | use,                 | reuse,             | ⊠ recycle,          | 🔀 reclaim            |
| 2. Amount of hazardo                     | ous waste produced:  |                    |                     |                      |
|  | 700                  | kg./mo.            |                     |                      |
|  |                      |                    |                     |                      |
| 3. Types of hazardou location and type). | is waste produced by | Hazardous Waste Nu | umber and destinati | on facility (include |
| Waste Number                             | Destination          | Facility           | Location a          | nd Type              |
|  |                      |                    | Flanders No         | J transder           |
| Too many                                 | AETG/Chan            | n waste Mamt       | 1                   | facility             |
| to 113t.                                 |                      | 0                  |                     |                      |
|  |                      |                    |                     |                      |
|  |                      |                    |                     |                      |
|  |                      |                    |                     |                      |
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|  |                      | L_                 | <del></del>         |                      |

ER-WM-300: Rev. 11/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

| ite Name | Univ of Penn | ID Number | PADO 4225\$712 | Date | 6/17/96 |
|----------|--------------|-----------|----------------|------|---------|
|----------|--------------|-----------|----------------|------|---------|

### Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

|              | STA | TUS |   |   | CHAPTER      | LINE |
|--------------|-----|-----|---|---|--------------|------|
| 1            | 2   | 3   | 4 | REQUIREMENT   | CITATION     | ITEM |
| X            |     |     |   | Hazardous waste determination, performed on all waste streams   | 262.11       | H001 |
| X            |     |     |   | Identification number   | 262.12       | H002 |
| X            |     |     |   | Hazardous waste shipments offered only to licensed transporters   | 262.12(d)    | H003 |
| X            |     |     |   | Authorization received from TSD facility for wastes shipped off-site within PA  | 262.13       | H004 |
| X            |     |     |   | PA manifest used for intrastate shipments   | 262.20(b)    | H005 |
| χ            |     |     |   | TSD state manifest or PA manifest used for out-of-state shipments   | 262.20(c)    | H006 |
| Ŷ            |     |     |   | Manifests filled out properly and completely  | 262.20(g)    | H007 |
|              |     |     |   | Manifests routed properly and within time limits (7 days)   | 262.23(e)(f) | H008 |
| X            |     |     |   | Proper U.S. DOT shipping containers or packages being used  | 262.30(1)    | н009 |
| X            |     |     |   | Shipping containers marked and labeled according according to U.S. DOT  | 262.30(2)    | H010 |
| X            |     |     |   | Containers of 110 gal. or less permanently marked with required hazardous waste label   | 262.30(3)    | H011 |
| X            |     |     |   | Placards offered to transporter   | 262.33       | H012 |
| X            |     |     |   | Waste in containers or tanks accumulated on-site for less than 90 days  | 262.34(a)(1) | H013 |
| X            |     |     |   | Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J                             | 262.34(a)(2) | H014 |
| χ            |     |     |   | Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3)) | 262.34(a)(3) | H015 |
| 1            |     |     |   | a). All containers of haz, waste in good condition  | 265.171      | H016 |
| x            |     |     |   | b). Containers compatible with hazardous waste being stored within  | 265.172      | H017 |
| $\mathbf{x}$ |     |     |   | c). Containers of hazardous waste kept closed   | 265.173(a)   | H018 |
| X            |     |     |   | d). Containers of hazardous waste are managed to prevent leaks  | 265.173(b)   | H019 |
| X            |     |     |   | e). Containers of hazardous waste labelled to accurately identify contents  | 265.173(c)   | H020 |
| X            |     |     |   | f). Haz. waste accumulation areas inspected at least weekly   | 265.174      | H021 |
| $\setminus$  |     |     |   | g). Special requirements for ignitable, reactive and incompatible waste being met   | 265.176177   | H022 |
| X            |     |     | Γ | h). Proper containment and collection system(s)   | 265.178      | H023 |
| X            |     |     |   | Containers clearly marked with accumulation date and visible for inspection   | 262.34(a)(4) | H024 |
| X            |     | Г   |   | On the job or classroom personnel training program as per 265.16  | 262.34(a)(5) | H025 |

Univ Of Penn PADY42250712 6/17/96

### **Hazardous Waste Inspection Report** Generators - Part B

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance STATUS LINE **CHAPTER** REQUIREMENT CITATION ITEM 2 3 4 262.40(a) H026 Records retained at designated location for 20 years 262.41(a) H027 Quarterly reports submitted to the Department Exception reporting procedures followed 262.42 H028 262.45 H029 Hazardous waste disposal plan, if required H030 Spill reporting procedures followed 262.46(a) H031 Preparedness, Prevention and Contingency Plan developed and 262.46(e) implemented in accordance with Chapters 264 and 265 262.50,.53, H032 Special requirements followed for international shipments 55, .60 Source reduction strategy prepared and available 262.80 H033

### 

### **INSPECTION REPORT COMMENTS**

| Date of Inspection              | 6/17/96  | Identification Number                  | P40042250712                          |
|---------------------------------|--|--|---------------------------------------|
|                                 | Name University  | of Pennsylvania                        |                                       |
| A larg                          | e quantity generator   | of hazardous w                         | aste inspection                       |
| was performed                   | at the above referen   | red facility. Pr                       | esent during the                      |
| inspection were                 | e Ruger Savage and   | Heather Bouch of                       | the Department                        |
| and Kyle Ros                    | sato of University   | of tennsylvania                        | (UPenn)                               |
| likenn                          | generates a uside va   | riety of hazardous                     | waster from the                       |
| laboratories en                 | campus and at ,  | campus facilities.                     | At the time of the                    |
| Inspection AE                   | TS, the off-site +   | ransporter was on                      | site lab packing                      |
| the wastes ger                  | nerated from the end   | of the school year                     | - cleanup.                            |
| All down                        | ns in the transport  | t truck were labeled                   | properly, and                         |
| the staying are                 | ea had proper secon  | dary containment                       | and sufficient                        |
| spill clean-up                  | naterals   | (                                      |                                       |
| The reco                        | irds were renewed.   |  |                                       |
| No violati                      | ons observed.  |  |                                       |
|                                 |  | · · · · · · · · · · · · · · · · · · ·  |                                       |
|                                 |  |  |                                       |
|                                 |  |  |                                       |
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|                                 |  | · \                                    |                                       |
|                                 |  | <del>}</del>                           | -                                     |
|                                 |  |  |                                       |
|                                 | s notice of the findings of an inspecti  |  |                                       |
| either violations noted herein, | olations observed during the inspect<br>, or other violations identified as a reso | ult of review of laboratory analyses o | or Department records.                |
|                                 | onstitute an order or other appeala<br>nunity from legal action for any violati    |  | othing contained herein shall be      |
| Signature by the pers           | son interviewed does not necessarii  | ly imply concurrence with the fir      | ndings on this report, but does       |
| acknowledge that the person     | was shown the report or that a copy w  | ras left with the person.              |                                       |
| Person interviewed (sign        | nature)  | Date                                   |                                       |
| Inspector (signature)           | Jothu & Price  | Date                                   | 6/29/96                               |
|                                 |  |  | Page 4 of 5                           |

4/1796 University of Pansylvania PADØ42258712

Hazardous Waste Inspection Report

Land Disposal Restriction Supplemental Checklist

| , • ; |            | '    | 1-N | Violation Observed 2-Not Applicable   | 3-Not Determined                   | 4-Non-Compliance           |
|-------|------------|------|-----|---|------------------------------------|----------------------------|
|       | Sta        | itus |     | REQUIRE   | MENT                               | Clation                    |
| 1     | 2          | 3    | 4   | , negoine   |                                    | 40 CFR<br>Part 268         |
|       |            |      |     | Generators  |                                    |                            |
| X     |            |      |     | Notification sent with shipments of wastes that d   | o not meet treatment standards.    | . 7(a)(1)                  |
| <     |            |      |     | Notification and certification sent with shipments  | of wastes meeting treatment sta    | ndards. 7(a)(2)            |
| C     |            |      |     | Dilution not used as a substitute for treatment.  |                                    | 3                          |
| 2     |            |      |     | Records maintained of notifications, certification supporting use of knowledge for waste classifications. | ons, waste analysis, and documion. | nentation 7(a)(5), (a)(6   |
| *     | Х          |      |     | Storage Facilities  |                                    |                            |
|       | W          |      |     | Facility verifies generators classification of waste  | in accordence with waste analys    | 25 Pa Code<br>265.13(c)    |
|       | X          |      |     | Containers marked to identify contents and accu   | mulation date.                     | 50(a)(2)                   |
|       | 7          |      |     | Notification sent with shipments of wastes that do  | not meet treatment standards.      | 7(a)(1)                    |
|       |            |      |     | Notification and certification sent with shipments  | of wastes meeting treatment sta    | ndards. 7(a)(2)            |
|       |            |      |     | Facility maintains records of documents produce   | d pursuant to LDR requirements.    | . 7(a)(6)                  |
|       |            |      |     | Treatment Facilities, including PBR and Ri  | IR Facilities                      |                            |
|       | $\sqrt{V}$ |      |     | Dilution not used as a substitute for treatment.  | ,                                  | 3                          |
|       | $\bigvee$  |      |     | Facility tests wastes or treatment residues to treatment standards in accordance with waste an            |                                    | plicable 7(b)              |
|       | /X         |      |     | Certification and/or notification sent with shipmen   | ts of waste.                       | 7(b)(4), (b)(5),<br>(b)(6) |
|       | XV         |      |     | Land Disposal Facilities  |                                    |                            |
|       | W          |      |     | Facility tests wastes received to assure compliant  | e with applicable treatment star   | ndards. 7(c)(2)            |
|       |            |      |     | Facility land disposes of restricted waste only if it m   | neets applicable treatment stand   | fard. 40                   |
|       |            |      |     | Facility retains copies of generator notifications an   | d certifications.                  | 7(c)(1)                    |

ER-WM-301: Rev. 11/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS - PART A

| Date of Inspection              | 96               | Time start              | Time finish            |
|---------------------------------|------------------|-------------------------|------------------------|
| Name of Inspector Heat          | her Bour         | h                       |                        |
| Company, installation name_     | B Univ of        | - Penneylvania          |                        |
| Location 3451 Walnut            | St.              | Phila PA119104          |                        |
| County Phila                    |                  | Municipality _Phila     |                        |
| Identification number P         | AD \$422.50      | 6712                    |                        |
| Name of responsible official_   | Kyle R           | osato                   |                        |
| Title Industria                 | d trainist       |                         |                        |
| Mailing Address <u>OFHS</u>     | 1408             | Blockley Hall Phila     | PA 19/04-6021          |
| Area code and telephone nur     | nber (215        | 1 698 -4453             |                        |
| Name of person interviewed      |                  |                         |                        |
| Title                           |                  | AIN                     |                        |
| Mailing address (if different i | from above)      | <i></i>                 |                        |
| Area code and telephone nur     | nber             |                         |                        |
|                                 |                  | ۵۸                      | A4 5100                |
| 1. a. Pa hazardous wast         | e transporter (H | WT) license number PA   | - Au 2142              |
| b. Expiration date              | 3/31/9           | 8                       |                        |
| 2. Hazardous waste handli       | ing: 🛛 N/A       |                         |                        |
| a. 🔲 Blending,                  | ☐ Mixing         |                         |                        |
| b. Storage                      | ☐ Treatment      | □ Disposal              |                        |
| c. 🔲 Use,                       | Reuse            | ☐ Recycle               | Reclaim                |
| 3. Does the transporter ge      | nerate hazardo:  | us wastes? 🛛 Yes 🔲 No   |                        |
| 4. Types of hazardous was       | te produced by i | Hazardous Waste Number: |                        |
|                                 | To many          | to list. Lab Pack       | ed materials handled   |
|                                 | ·                | ·                       | by AETS at facility in |
|                                 |                  |                         | Flanders, NJ           |
|                                 |                  |                         | manders, 100           |

EF 9974-301: Rev. 11/93

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS- PART B

Site Name PAR Univ of Penn ID Number PADØ42250712 Date 6/17/96

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

|   | STATUS |           | • | REQUIREMENT   |             | LINE    |
|---|--------|-----------|---|---|-------------|---------|
| 1 | 2      | 3         | 4 | REQUIREMENT   | CITATION    | NUMBERS |
| X |        |           |   | Identification number   | 263.11      | H500    |
| X |        |           |   | Company licensed by PA DER  | 263.13(a)   | H501    |
| × |        |           |   | License conditions met: License card on vehicle   | 403 SWMA    | H502    |
| X | 1      |           | Ī | License conditions met: PPC plan on vehicle   | 403 SWMA    | H503    |
| X |        |           |   | License conditions met: Insurance card on vehicle   | 403 SWMA    | H504    |
| X |        |           |   | Waste accepted only from generators with ID numbers except as provided in §261.5, 261.6 and 263.30      | 263.11(c)   | Н505    |
|   |        |           |   | Properly completed manifest accompanies all shipments   | 263.20(a)   | H506    |
|   |        | M         |   | Required number of copies of the manifest accompanies shipment  | 263.20(c)   | H507    |
|   |        | V         |   | Entire quantity delivered as stated on manifest   | 263.21(a)   | H508    |
|   |        | I         |   | Undeliverable shipment procedures followed  | 263.21(b)   | H509    |
|   |        | <b>//</b> |   | Shipments comply with U.S. and PA DOT requirements  | 263.21(c)   | H510    |
| X |        |           |   | Only normal in-transit storage of waste   | 263.23(b)   | H511    |
| X |        |           |   | Records retained at designated location   | 263.22      | H512    |
| X |        |           |   | Contingency plan approved and implemented for discharge or spills                                       | 263.30(f-h) | H513    |
| X |        |           |   | Appropriate and adequate safety equipment carried on transport vehicle                                  | 263.31(b)   | H514    |
|   |        | X         |   | Equipment decontamination procedures followed   | 263.31(c)   | H515    |
|   |        | X         |   | Contaminated washwater, waste solutions, residues disposed of in accordance with regulations            | 263.31(c)   | H516    |
|   | X      |           |   | Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less | 263.31(d)   | H517    |
| X |        |           |   | Bond and insurance amounts sufficient   | 263.32(c)   | H518    |

Onsite manifests used by Univ. of Penn, but not reviewed during the inspection.
Offsite manifests were inspected.

. 1 .

### DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

### INSPECTION REPORT COMMENTS

| Date of Inspection 6/17/96 Identification  Company/Facility/Site Name   Liniversity of Pennsylvania    A hazardorus waste transporter in set the above resevenced facility. Present during Savage and Hather Boneh of the Departmen University of Pennsylvania (UPann).  Upann has a hazardorus waste transporter to collect hazardorus waster from various loccution are connected by public highways/Streets. The The University has purchased a new weehile which | Pection was performed at the inspection were Roger to and Kyle Rosato of liscence to enable them son their campus which |
|--|---|
| A hazardous waste transporter in so<br>the above resevenced facility. Present during<br>savage and Heather Boneh of the Departmen<br>University of Pennsylvania (UPCNN).<br>UPCNN has a hazardous waste transporter<br>to collect hazardous waster from various location<br>are connected by public highways / Streets. The<br>The University has purchased a new weakyle whi  | Pection was performed at the inspection were Roger to and Kyle Rosato of liscence to enable them son their campus which |
| Savage and Hather Boneh of the Departmen University of Pennsylvania (Upon).  Upon has a hazardous waste transporter to collect hazardous waster from various location are connected by public highways / Streets. The University has purchased a new weaker whi  | t and kyle Rosato of<br>liscence to enable them<br>son their campus which   |
| Savage and Hather Boneh of the Departmen University of Pennsylvania (Upon).  Upon has a hazardous waste transporter to collect hazardous waster from various location are connected by public highways / Streets. The University has purchased a new weaker whi  | t and kyle Rosato of<br>liscence to enable them<br>son their campus which   |
| When has a hazardous waste transporter to collect hazardous waster from various location are connected by public highways / Streets. The The University has purchased a new weakste whi  | s on their campus which   |
| to collect hazardous waster from various location are connected by public highways / Streets. The The University has purchased a new weather white   | s on their campus which   |
| The University has purchased a new weather white   |   |
| The University has purchased a new weather white   | -1 1 11 11  |
| The University has purchased a new weatherle whi   | y are considered a small handle   |
|  | in they will be using to  |
| transport waster ancampus as soon as they has  | reouts Hedit property.  |
| No violations observed.  |   |
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#### Pennsylvania Department of Environmental Resources Bureau of Wasta Management

### Hazardous Waste Inspection Report Generators — Part A

| Date of inspection $\frac{1/15/93}{2}$ Time  | ne start $-2:3$    | Car         | Time finish _        | 11:30 am               |
|--|--------------------|-------------|----------------------|------------------------|
| Name of inspector hoger for                  | agl                |             |                      |                        |
| Company, installation name Maiver            | Sitvot             | Venn        | Er/van               | <sup>2</sup> a         |
| Location 3451 Walnut 94                      | , Phil             | a. 1        | PA 1910              | 94                     |
| County Phila.                                | Municipali         | tv Ph       | ila.                 |                        |
| Identification number PAD0427                |                    |             |                      |                        |
|  | 09940              |             |                      |                        |
| Title Industrial Hyg                         | enigt              |             |                      |                        |
| Mailing address OFAS/1409                    |                    | eVHO        | 7/1, Ph              | la, PA , 1910          |
| Area code and telephone number (215)         | 898-44             | 53          |                      | 60                     |
| Name of person interviewed Same              |                    |             |                      |                        |
| Title Same                                   |                    |             |                      |                        |
| Mailing address (if different from above)    | ne                 | · .         | <del></del>          |                        |
| Area code and telephone number               | /                  |             |                      |                        |
| 1. Current waste handling method:            |                    |             |                      |                        |
|  | C etorage          | □ dienos    | al 🗆 PBF             | <b>)</b>               |
| a. On-site treatment,                        | storage,           | dispos      |                      |                        |
| b.  On-site use,                             | □ reuse,           | ☐ recycl    |                      | allii                  |
| c. Ø Off-site 🗆 treatment,                   | storage,           | dispos      |                      |                        |
| d. 🙇 Off-site 🗆 use,                         | □ reuse,           | Æ recyc     | e, A recl            | aim                    |
| 2. Amount of hazardous waste produced:       |                    |             |                      |                        |
| a  | kg./mo.            |             |                      |                        |
| b  | <i>lo</i> kg./yr.  |             |                      |                        |
| 3. Types of hazardous waste produced by Haza | rdous Waste Number | and destina | tion facility (inclu | de location and type). |
| Waste Number Destina                         | tion Facility      | 1           | Location             | and Type               |
| Too many clean lar                           | bors               | 1/4         | tick,                | MA                     |
| to light the Clean Ho                        | rbors              | Ha          | dfmore               | · BMA                  |
| Connectic. 4+                                | Treatmen           | + Com       | Lonnec               | ticut                  |
| Gean Harb                                    | ors                | B           | rain fr              | e, 111                 |
|  |                    |             |                      |                        |
|  |                    |             |                      |                        |
|  |                    |             |                      |                        |
| <u> </u>                                     |                    |             |                      |                        |

### Pennsylvanic Department of Environmental Resources Bureau of Wasta Management

### Hazardous Waste Inspection Report Generators — Part B

|   |        | 1-N  | • Viol                      | lation Observed 2—Not Applicable 3—Not Determined 4—Non-                       | Compliance          |
|---|--------|--|-----------------------------|--|---------------------|
|   | Status |  | ii L Q O i ii L iii L iii l |  | Chapter<br>Citation |
| 1 | 2      | 3 4  Hazardous waste determination, copies available |                             |  | 262                 |
| X |        |  |                             | Hazardous waste determination, copies available                                | .11                 |
| X |        |  |                             | Identification number  | .12(a)              |
| X |        |  |                             | Hazardous waste shipments offered only to licensed transporters                | .12(d)              |
| X |        |  |                             | Authorization received from TSD facility for wastes shipped off-site           | .13                 |
| X |        |  |                             | PA manifest used for intrastate shipments                                      | .20(b)              |
| X |        |  |                             | Disposer state manifest or EPA format manifest used for out-of-state shipments | .20(c)              |
| X |        |  |                             | Manifests filled out properly and completely                                   | .20(g)              |
| X |        |  |                             | Manifests routed properly and within time limits (7 days)                      | .23(e,f)            |
| X |        |  |                             | Proper U.S. DOT shipping containers or packages                                | .30(1)              |
|   |        |  |                             | Shipping containers marked and labeled according to U.S. DOT                   | .30(2)              |
|   |        |  |                             | Containers of 110 gal. or less marked with required PA label                   | .30(3)              |
| 1 |        | X  |                             | Placards offered to transporter  | .33                 |
| V |        | <del>- \</del>                                       |                             | Wastes accumulated on-site for less than 90 days                               | .34(1)              |
|   |        |  |                             | Wastes stored in proper containers and properly marked and labeled             | .34(2)              |
| X |        |  |                             | Containers managed in accordance with 75.265(q)(1)—(9)                         | .34(3)              |
| V |        |  |                             | Containers clearly marked with accumulation date and visible for inspection    | .34(4)              |
| X |        |  |                             | Records retained at designated location for 20 years                           | .40                 |
| X |        |  |                             | Quarterly reports submitted to the Department                                  | .41                 |
| X |        |  |                             | Exception reporting procedures followed  | .42                 |
|   | X      | ,  |                             | Hazardous waste disposal plan, if required                                     | .45                 |
| X |        |  |                             | Spill reporting procedures followed  | .46(a)              |
| X |        |  |                             | Preparedness, Prevention and Contingency Plan and implemented                  | .46(e)              |
| X |        |  |                             | Special requirements followed for international shipments                      | .50.53.55.60        |
| X |        |  |                             | On the job or classroom personnel training program 265.16                      | .34(a)(5            |
| X | _      |  |                             | Drum accumulation area inspected weekly as per 265.174                         | .34(a)(3            |
|   |        |  |                             |  |                     |
| _ |        |  |                             |  |                     |
|   |        |  |                             |  |                     |





# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

| _ |         |   | 1·N | o Violation Observed 2-Not Applicable 3-Not Determined 4-Non  | Compliance                |
|---|---------|---|-----|---|---------------------------|
|   | Status  |   |     | REQUIREMENT   |                           |
| 1 | 2       | 3 | 4   |   |                           |
|   |         |   |     | Generators  |                           |
| 1 |         |   |     | Notification sent with shipments of wastes that do not meet treatment standards.  | 7(a)(1)                   |
| 1 | Γ       |   |     | Notification and certification sent with shipments of wastes meeting treatment standards.   | 7(a)(2)                   |
| 7 |         |   |     | Dilution not used as a substitute for treatment.  | 3                         |
| X |         |   |     | Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.    | 7(a)(5),(a)               |
|   | X       |   |     | Storage Facilities  |                           |
|   |         |   |     | Facility verifies generators classification of waste in accordence with waste analysis plan.  | 25 Pa Code<br>265.13(c)   |
| 1 |         |   |     | Containers marked to identify contents and accumulation date.   | 50(a)(2)                  |
| 1 |         |   |     | Notification sent with shipments of wastes that do not meet treatment standards.  | 7(a)(1)                   |
| 1 | $\prod$ |   |     | Notification and certification sent with shipments of wastes meeting treatment standards.   | 7(a)(2)                   |
| T | $\prod$ |   |     | Facility maintains records of documents produced pursuant to LDR requirements.  | 7(a)(6)                   |
| T | $\prod$ |   |     | Treatment Facilities, including PBR and RRR Facilities  |                           |
| T | $\prod$ |   |     | Dilution not used as a substitute for treatment.  | 3                         |
| I |         |   |     | Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan. | 7(0)                      |
|   |         |   |     | Certification and/or notification sent with shipments of waste.   | 7(b)(4), (b)(5)<br>(b)(6) |
|   |         |   | T   | Land Disposal Facilities  |                           |
|   |         |   | Ti  | Facility tests wastes received to assure compliance with applicable treatment standards.  | 7(c)(2)                   |
|   |         |   | F   | actify land disposes of restricted waste only if it meets applicable treatment standard.  | 40                        |
| 7 | V       | 7 | F   | acility retains copies of generator notifications and certifications.   | 7(c)(1)                   |

3 of 4

#### Commonwealth of Pennsylvania Department of Environmental Resources Bureon of Wasta Management

### **Inspection Report Comments**

| Date of Inspection $\frac{9}{15}$     | Identification Number | PAD042250712 |
|---------------------------------------|-----------------------|--------------|
| Company/Facility/Site Name Walkersity | of Penn               | sylvania     |
| Permission to con                     | duct a                | routine      |
| inspection was gi                     | ven by                | Kyle Rosato. |
| The containment                       | drea                  | inthe        |
| consolidated waste                    |                       |              |
| completed.                            |                       |              |
| All confainers were                   | marke                 | d with an    |
| accumulation Late                     | + UFC                 | ode.         |
| No violations we                      | ere obs               | erved.       |
|                                       |                       |              |
|                                       |                       |              |
|                                       |                       |              |
|                                       |                       |              |
| · .                                   |                       |              |
| 2/                                    |                       | _            |
|                                       |                       |              |
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|                                       | •                     |              |
|                                       |                       |              |
|                                       |                       |              |
|                                       |                       |              |
|                                       |                       |              |

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) | Date 7/15/93 |
|--------------------------------|--------------|
| Inspector (signature)          | Date 7/15/93 |
| Impector (agracia)             | Page of      |

#### Pennsylvania Department of Environmental Resources Bureau of Waste Management

### Hazardous Waste Inspection Report Transporters — Part A

| Date of inspection $\frac{7/15}{2}$ | <u> </u>             | rt <u>9130 a</u>     | Time finish   | 11:30 am      |
|-------------------------------------|----------------------|----------------------|---------------|---------------|
| Name of inspector Roge              | r Savag              | e                    |               |               |
| Company name Trustes                | s of the             | Universi             | ty of Pe      | ansylvania    |
| Location 345/ Wa                    | lout St.             | Phila                | PA 19/        | 04            |
| County Phila.                       |                      | Municipality/        | Phila.        |               |
| Identification number $PAD$         | 042750               | 7/2                  |               |               |
| Name of responsible official K      | yle Rosa             | to                   |               |               |
| Title _ Industria                   | ' A A/               |                      |               |               |
| Mailing address # OE                | HS/1408              | Blockley             | Aall, Phi     | la, 8A 19104- |
| Area code and telephone number      |                      | /                    |               | 602,          |
| Name of person interviewed          | V/2 Rosa             | 40                   |               |               |
| Title gane                          |                      | ·                    |               | .,            |
| Mailing address (if different from  | above) <u>Same</u>   |                      |               |               |
| Area code and telephone number      | _                    |                      |               |               |
| 1 - De hannedous weeks troops       |                      | number PA-AA         | 4 5 197       |               |
| 1. a. Pa hazardous waste trans      |                      |                      |               |               |
| b. Expiration date                  |                      |                      |               |               |
| 2. Hazardous waste handling:        |                      |                      |               |               |
| a. 🗆 Blending,                      | ☐ Mixing             | □ Biograph           |               |               |
| b. 🗆 Storage,                       | ☐ Treatment          | □ Disposal           | ET By Life    |               |
| c. Use,                             | ☐ Reuse              | □ Recycle            | ☐ Reclaim     |               |
| 3. Does the transporter generate    |                      | ☐ Yes     No         |               |               |
| 4. Types of hazardous waste pro     | oduced by Hazardous  | Waste Number:        | 1             |               |
|                                     |                      | •                    |               |               |
| 5. Are hazardous wastes transpo     | orted into the Commo | nwealth from abroad? | □ Yes   Д? No |               |

#### Pennsylvania Department of Environmental Resources Bureau of Waste Management

# Hazardous Waste Inspection Report Transporters — Part $\mathbf{B}^{\mathrm{c}}$

|                      |      |   |   |  | Chapter       |
|----------------------|------|---|---|--|---------------|
| - 1                  | Stat |   |   | REQUIREMENT  | Citation      |
| 1                    | 2    | 3 | 4 | Identification number  | 75.263<br>(b) |
| (                    | _    |   |   | Company licensed by PA DER.  |               |
| X                    |      |   |   |  | (c)           |
| 4                    |      |   |   | Copy of license kept on vehicles transporting hazaradous wastes.   | (c)(8)(iv)    |
| $\langle \downarrow$ |      |   |   | Licensee transporting only wastes conditioned on the license.  | (d)           |
|                      |      |   |   | Manifest accompanies all shipments. 🔏  | (d)           |
|                      |      |   |   | Required number of copies of the manifest accompanies shipment.  | (d)(9)(i)     |
|                      |      |   |   | Shipments comply with U.S. and PA DOT requirements.  | (d)(9)(ii)    |
| r                    |      |   |   | Entire quantity, as stated on the manifest, delivered. 🔏   | (d)(9)(iii)   |
|                      |      |   |   | Undeliverable shipment precedures following.   | (d)(10)       |
|                      |      |   |   | Normal in-transit storage of waste (only if specified on the manifest).                                  | (e)(2)        |
|                      |      |   |   | Records retained at designated location.   | (f)           |
|                      |      |   |   | Contingency plan approved and implemented.   | (g)(6)        |
| 7                    |      |   |   | Appropriate and adequate safety equipment carried on transport vehicle.                                  | (h)(2)        |
|                      |      |   | 1 | Equipment decontamination procedures followed.   | (h)(3)        |
| 7                    |      |   |   | Contaminated washwater, waste solutions, residues disposed of in accordance with regulations.            | (h)(3)        |
| 4                    |      |   |   | Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less. | (h)(4)        |
|                      |      |   |   | * for the surposes of this inspects  | Son,          |
| +                    |      |   |   | "manifest" will mean the facili-<br>modified Hazardous waste mani<br>(see attached)                      | Fest          |
| 1                    |      |   |   |  |               |
| 1                    |      |   |   |  |               |
| +                    | _    |   |   |  |               |
| _                    |      |   | _ |  |               |

#### Commonweelth of Pannsylvania Department of Environmental Resources Burson of Wasta Management

### **Inspection Report Comments**

| Date of Inspection 1/15/93 Identification Number PA-AH 5/92  Company/Facility/Site Name University of Pansylvania       |
|---|
| Company/Facility/Site Name University of tennsylvania   |
| Formission to conduct a reatine transporter inspection was given by   |
| transporter inspection was given by   |
|   |
| The University of Pennsylvania presently generates pazardous waste at various   |
|   |
| sites within the campus. The waste  |
| is transported from the various   |
| locations on campus to the Consolidate  |
| Waste Facility which is also on Compus.   |
| The transporter must drive on public  |
| roads in order to transport waste   |
| from the point of generation to the   |
| Consolidated Waste Facility. A modified   |
| manifest is used in lieu of a PA state  |
| manitegt.   |
| The Department may waive the  |
| manifesting requirements in this  |
| particular situation.   |
| particular situation. No violations observed.   |
|   |
| In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of |

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) // Le // NJZA | Date 7/15/23 |
|--|--------------|
| Inspector (signature)                        | Date 7/15/93 |
| inspector (signature)                        | Page 2 of 3  |

**Internal Waste Manifest:** Lab Pack Chemicals

EPA Generator ID #: PAD042250712

Trustees of the University of Pennsylvania OEHS/ 1408 Blockley Hall Philadelphia PA 19104-6021 Generator Name & Mailing Address:

Generator Phone & Contact:

(215) 898-4453 Kyle Rosato or Matthew D. Finucane, Director

PA Small Handler's Permit Number: Designated Storage Facility Location: PAAHS192

University of Pennsylvania
Consolidated Waste Facility

|        | Consolidated waste facility         |
|--------|-------------------------------------|
| Datle: | 401 Guardian Drive, Philadelphia PA |

| Tag No.                           | Bldg Code | Room | Quant | Unit | P.I. | Extension | Compound | Location |
|-----------------------------------|-----------|------|-------|------|------|-----------|----------|----------|
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
| · , , , <del>, 22-111</del> , 2-1 |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          | 1,000    |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |
|                                   |           |      |       |      |      |           |          |          |

**Internal Waste Manifest:** 

EPA Generator ID #: PAD042250712

Generator Name & Mailing Address:

Trustees of the University of Pennsylvania OEHS/ 1408 Blockley Hall

**Mixed Waste Chemicals** 

Philadelphia PA 19104-6021

Generator Phone & Contact:

(215) 898-4453 Kyle Rosato or Matthew D. Finucane, Director

PA Small Handler's Permit Number: Designated Storage Facility Location: PAAHS192 University of Pennsylvania

Consolidated Waste Facility

401 Guardian Drive, Philadelphia PA

| Number | Date | Bldg. | Room |
|--------|------|-------|------|
| Quant. | Unit | P.I.  | Ext. |

| Compound            | 1 | Qty. | Compound             | 1 | Qty. | Compound | Qty. |
|---------------------|---|------|----------------------|---|------|----------|------|
| Acetone             |   |      | Methylene Chloride   |   |      |          |      |
| Acetonitrile        |   |      | N-Methylimidazole    |   |      |          |      |
| Chloroform          |   |      | N-Methylpyrrolidone  |   |      |          |      |
| Dichloroacetic Acid |   |      | Tetrazole            |   |      |          |      |
| Ethanol             |   |      | Toluene              |   |      |          |      |
| Ethyl Acetate       |   |      | Trifluoroacetic Acid |   |      |          |      |
| Hexane              |   |      | Water                |   |      |          |      |
| Methanol            |   |      | Xylene               |   |      | ,        |      |
| Location:           |   |      |                      |   |      |          |      |

| Number | Date | Bldg. | Room |
|--------|------|-------|------|
| Quant. | Unit | P.I.  | Ext. |

| Compound            | 1 | Qty. | Compound             | 1 | Qty. | Compound | Qty. |
|---------------------|---|------|----------------------|---|------|----------|------|
| Acetone             |   |      | Methylene Chloride   |   |      |          |      |
| Acetonitrile        |   |      | N-Methylimidazole    |   |      |          |      |
| Chloroform          |   |      | N-Methylpyrrolidone  |   |      |          |      |
| Dichloroacetic Acid |   |      | Tetrazole            |   |      |          |      |
| Ethanol             |   |      | Toluene              |   |      |          |      |
| Ethyl Acetate       |   |      | Trifluoroacetic Acid |   |      |          |      |
| Hexane              |   |      | Water                |   |      |          |      |
| Methanol            |   |      | Xylene               |   |      |          |      |
| Location:           |   |      |                      |   |      |          |      |

☐ Not Required by EPA

TOUP

Lumed

| EVALUATION - VIOLATION - ENFORCEMENT FORM                                      |
|--|
| Handler ID Number Handler Type   |
| PADO422507/Z LDF[] TSF[] INC[] LQG[X SQG[] CEG[] TRAIX                         |
| Handler Name   Contact Name   Date Submitted                                   |
|  |
| VIII CI III CI IOMI I III III III III III III III III                          |
| 345/ Walnut Street Phila, PA 19104   |
| EVALUATION Add Change Delete   |
| Date Number Agency Type Reason Branch Person                                   |
| 0711593 SCET WM RLS.   |
| AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated · NA - Not Applicable ) |
| GER GPT GBF TWD DGS DLT DPB DWP  |
| GGRE GRRE TGRE DCH DGW DMC DPP DBF   |
| GLB GSC TMR E DCL DIN DMR DSI CAS  |
|  |
|  |
| GOR GEX TRR DFR DLF DOT CSS  |
| Comments Transporter license # PA-AH5192                                       |
| OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION                             |
| Agency Number Area Date Determined Agency Number Area Date Determined          |
|  |
|  |
|  |
|  |
|  |
| ▎╞ <del>╛╘╧╧╧</del> ┩╞ <del>╧╧╛┡╧╃╧╃╧</del> ┩╎╞┩╞╧╧╧┪╞╧╧╣╞╧ <del>╅</del>       |
|  |
|  |
| VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)                    |
| Agency Number Area Class Regulation Type Regulation Citation                   |
|  |
| Returned to Compliance   |
| Date Determined Priority Branch Person Scheduled Actual                        |
|  |
| Comments   |
| VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)                    |
|  |
| Agency Number Area Class Regulation Type Regulation Citation                   |
|  |
| Returned to Compliance Date Determined Priority Branch Person Scheduled Actual |
|  |
|  |
| Comments   |

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data

| VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)  |
|--|
|  |
| Agency Number Area Class Regulation Type Regulation Citation   |
| Returned to Compliance  Date Determined Priority Branch Person Scheduled Actual  |
| Comments   |
| VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)  |
| Agency Number Area Class Regulation Type Regulation Citation   |
| Returned to Compliance  Date Determined Priority Branch Person Scheduled Actual  |
| Comments   |
| VIOLATION Add Change Delets Link to Above Evaluation? (Y/N)  |
| Agency Number Area Class Regulation Type Regulation Citation   |
| Returned to Compliance  Date Determined Priority Branch Person Scheduled Actual  |
| Date Determined Priority Branch Person Scheduled Actual  |
| Comments   |
|  |
| Comments   |
| Comments ENFORCEMENT Add Change Delete   |
| Comments  ENFORCEMENT Add Change Delete  Date Number Agency Type Branch Person Attorney Initials   |
| ENFORCEMENT Add Change Delete  Date Number Agency Type Branch Person Attorney Initials  Penalty Assessed \$ Settled \$ POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION  PPE - Pollution Prevention EAE - Environmental Auditing PRE - Pollution Reduction EPE - Environmental Public Awareness ERE - Environmental Restoration VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION |
| ENFORCEMENT Add Change Delete  Date Number Agency Type Branch Person Attorney Initials  Penalty Assessed \$ Settled \$   POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION  PPE - Pollution Prevention  |
| ENFORCEMENT Add Change Delete  Date Number Agency Type Branch Person Attorney Initials  Penalty Assessed \$ Settled \$   POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION  PPE - Pollution Prevention  |
| ENFORCEMENT Add Change Delete  Date Number Agency Type Branch Person Attorney Initials  Penalty Assessed \$ Settled \$   POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION  PPE - Pollution Prevention  |

### Pennsylvania Department of Environmental Resources Bureau of Waste Management

### Hazardous Waste Inspection Report Generators — Part A

| Date of inspecti  | ion <u> </u>          | 5/93 Tin            | ne start $\underline{\mathcal{Z}}$ | 1300        | Ti            | me finish                 | 30 am        |
|-------------------|-----------------------|---------------------|------------------------------------|-------------|---------------|---------------------------|--------------|
| Name of inspec    | tor <u>Ro</u>         | oger Faur           | agl                                |             |               |                           |              |
| Company, instal   | lation name _         | Univer              | 3/14 O                             | t Ve        | MASY          | vania                     |              |
|                   |                       | alant 94            |                                    | n/a         | , PA          | 19104                     |              |
| County <u>F6</u>  |                       |                     | ,                                  | icipality   | Phil          | <i>a</i> ,                |              |
| Identification nu | umber $\underline{P}$ | AD0422              | 507                                | 12          |               | <del></del>               |              |
| Name of respon    | sible official_       |                     | 25290                              | ,           |               |                           |              |
| Title             | Lustr                 | ial Hyg             | en 197                             | <u> </u>    |               | 7 -2/ 1                   | C24 (        |
| Mailing address   | OFF                   | 15/1409             | Block                              | Kley        | 149/1         | , thea, t                 | A , 19/0     |
|                   |                       | mber $(Z(5))$       | 898 - 4                            | 1453        |               |                           | 60           |
| Name of persor    | ı interviewed_        | Synce               |                                    |             |               |                           |              |
| Title             | me                    |                     |                                    |             |               |                           |              |
| Mailing address   | (if different i       | from above) <u></u> | ne                                 |             |               |                           |              |
| Area code and     | telephone nur         | mber <u>Squar</u> l |                                    |             |               |                           |              |
| 1. Current was    |                       |                     |                                    |             |               |                           |              |
|                   |                       |                     | - etorogo                          |             | dienosal      | □ PBR                     |              |
|                   | On-site               | ☐ treatment,        | storage,                           | _           | disposal      |                           |              |
|                   |                       | □ use,              | ☐ reuse,                           |             | recycle,      | ☐ reclaim                 |              |
|                   | `                     | treatment,          | □ storage,                         | ` \         | disposal      | en e                      |              |
| d. 🔑              | ♥ Off-site            | use,                | □ reuse,                           | JAT         | recycle,      | ∑ reclaim                 |              |
| 2. Amount of      | hazardous wa          | aste produced:      |                                    |             |               |                           |              |
| a                 |                       | ~ 2700              | ` k(                               | j./mo.      |               |                           |              |
| b                 |                       | - 3500              | <u>O</u>                           | ]./yr.      |               |                           |              |
| 3 Types of h      | azardone was          | te produced by Haza | rdous Waste Ni                     | imher and o | destination f | acility (include location | nn and tyne) |
| Waste Nur         |                       |                     | tion Facility                      | moor and t  | 1             | Location and Typ          |              |
| too ma            | N 01                  | ean lar             | bors                               |             | Nat           | ick, MA                   |              |
| to ligh           | " Ba                  | Gean Ha             | rbor                               | 5           | Hald,         | imore,                    | 3MA_         |
|                   | Con                   | articut;            | reaton                             | estlo       | 2,6           | panecticu                 | 7            |
|                   | Ge                    | an Harb             | ors                                |             | Brai          | infree,                   | 111          |
|                   |                       |                     |                                    |             |               |                           |              |
| <del>/.</del>     |                       |                     |                                    |             |               |                           |              |
|                   |                       |                     |                                    |             |               |                           |              |
|                   |                       |                     |                                    |             | I             |                           |              |

### Pennsylvania Department of Environmental Recourses Bureau of Waste Management

## Hazardous Waste Inspection Report Generators — Part B

|                    |      | 1-N | • Viol | ation Observed 2—Not Applicable 3—Not Determined 4—Non-                        | Compliance          |
|--------------------|------|-----|--------|--|---------------------|
|                    | Stat | tus |        | REQUIREMENT  | Chapter<br>Citation |
| 1                  | 2    | 3   | 4      |  | 262                 |
| X                  |      |     |        | Hazardous waste determination, copies available                                | .11                 |
| X                  |      |     |        | Identification number  | .12(a)              |
| X                  |      |     |        | Hazardous waste shipments offered only to licensed transporters                | .12(d)              |
| X                  |      |     |        | Authorization received from TSD facility for wastes shipped off-site           | .13                 |
| X                  |      |     |        | PA manifest used for intrastate shipments                                      | .20(b)              |
| X                  |      |     |        | Disposer state manifest or EPA format manifest used for out-of-state shipments | .20(c)              |
| X                  |      |     |        | Manifests filled out properly and completely                                   | .20(g)              |
| X                  |      |     |        | Manifests routed properly and within time limits (7 days)                      | .23(e,f)            |
| $\hat{\mathbf{x}}$ |      |     |        | Proper U.S. DOT shipping containers or packages                                | .30(1)              |
|                    |      |     |        | Shipping containers marked and labeled according to U.S. DOT                   | .30(2)              |
| V                  |      |     |        | Containers of 110 gal. or less marked with required PA label                   | .30(3)              |
| 4                  |      | X   |        | Placards offered to transporter  | .33                 |
| V                  |      | ~ \ |        | Wastes accumulated on-site for less than 90 days                               | .34(1)              |
| X                  |      |     |        | Wastes stored in proper containers and properly marked and labeled             | .34(2)              |
| $\hat{X}$          |      |     |        | Containers managed in accordance with 75.265(q)(1)—(9)                         | .34(3)              |
| X                  |      |     |        | Containers clearly marked with accumulation date and visible for inspection    | .34(4)              |
| X                  |      |     |        | Records retained at designated location for 20 years                           | .40                 |
| X                  |      |     |        | Quarterly reports submitted to the Department                                  | .41                 |
| X                  |      |     |        | Exception reporting procedures followed  | .42                 |
|                    | X    |     |        | Hazardous waste disposal plan, if required                                     | .45                 |
| X                  |      |     |        | Spill reporting procedures followed  | .46(a)              |
| X                  |      |     |        | Preparedness, Prevention and Contingency Plan and implemented                  | .46(e)              |
| 1                  |      |     |        | Special requirements followed for international shipments                      | .50.53.55.60        |
| X                  |      |     |        | On the job or classroom personnel training program 265.16                      | .34(a)(5)           |
| X                  |      |     |        | Drum accumulation area inspected weekly as per 265.174                         | .34(a)(3)           |
|                    |      |     |        |  |                     |
| $\dashv$           |      |     |        |  |                     |
|                    |      |     |        |  |                     |



Recycled Paper 5

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

|        |         |   | 1.1 | o Violation Observed 2-Not Applicable 3-Not Determined  | 4-Non-Compliance                   |  |  |  |  |
|--------|---------|---|-----|---|------------------------------------|--|--|--|--|
| Status |         |   |     | REQUIREMENT   |                                    |  |  |  |  |
| 1      | 2       | 3 | 4   |   | 40 CFR<br>Part 268                 |  |  |  |  |
|        |         |   |     | Generators  |                                    |  |  |  |  |
| 1      |         |   |     | Notification sent with shipments of wastes that do not meet treatment standard  | da. 7(a)(1)                        |  |  |  |  |
| X      |         |   |     | Notification and certification sent with shipments of wastes meeting treatment s  | standards. 7(a)(2)                 |  |  |  |  |
| 1      |         |   |     | Dilution not used as a substitute for treatment.  | 3                                  |  |  |  |  |
| X      |         |   |     | Records maintained of notifications, certifications, waste analysis, and docusupporting use of knowledge for waste classification.    | umentation 7(a)(5), (a)(           |  |  |  |  |
|        | X       |   |     | Storage Facilities  |                                    |  |  |  |  |
|        |         |   |     | Facility verifies generators classification of waste in accordence with waste analy   | ysis plan. 25 Pa Code<br>265.13(c) |  |  |  |  |
| 7      |         |   |     | Containers marked to identify contents and accumulation date.   | 50(a)(2)                           |  |  |  |  |
| 1      |         |   |     | Notification sent with shipments of wastes that do not meet treatment standard  | \$. 7(a)(1)                        |  |  |  |  |
| 1      |         |   |     | Notification and certification sent with shipments of wastes meeting treatment st   | andards. 7(a)(2)                   |  |  |  |  |
|        | $\prod$ |   |     | Facility maintains records of documents produced pursuant to LDR requirement  | 8. 7(a)(6)                         |  |  |  |  |
|        | $\prod$ |   |     | Treatment Facilities, including PBR and RRR Facilities  |                                    |  |  |  |  |
| T      | $\prod$ |   |     | Dilution not used as a substitute for treatment.  | 3                                  |  |  |  |  |
|        |         |   |     | Facility tests wastes or treatment residues to determine compliance with a reatment standards in accordance with waste analysis plan. | pplicable 7(b)                     |  |  |  |  |
|        |         |   |     | Certification and/or notification sent with shipments of waste.   | 7(b)(4), (b)(5)<br>(b)(6)          |  |  |  |  |
|        |         |   |     | and Disposal Facilities   |                                    |  |  |  |  |
|        |         |   |     | acility tests wastes received to assure compliance with applicable treatment sta  | indards. 7(c)(2)                   |  |  |  |  |
|        |         |   | F   | acility land disposes of restricted waste only if it meets applicable treatment stan  | derd. 40                           |  |  |  |  |
| 17     | V       | T | 1   | actity retains copies of generator notifications and certifications.  | 7(c)(1)                            |  |  |  |  |

3 of 4

## Commonwealth of Paussylvania Department of Environmental Resources Bureau of Wasta Management

### **Inspection Report Comments**

| Date of Inspection $\frac{9/15/93}{}$   | Identification Number   | PAD042250712   |
|---|---|--|
| Company/Facility/Site Name <u>University</u>  | of Penn   | sylvania   |
| Permission to cond  |   | <b>,</b>   |
| inspection was give   | ren by  | Kyle Rosato.   |
| The containment   | arca  | inthe  |
| consolidated waste.   | facility  | has been   |
| completed.  |   |  |
| All confainers were   | marke   | L with an  |
| accumulation date   |   |  |
| No violations we  | re obs  | erved.   |
|   |   |  |
|   |   |  |
|   |   | • /  |
|   |   |  |
|   |   |  |
|   |   |  |
| 2/11  |   |  |
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|   |   |  |
|   |   |  |
|   |   |  |
| In the "Requirement" Section of this inspection report, ets corresponding obligation as described in the body of the registion report as a reference to obtain a detailed description of This inspection report is official notification that a represe of Waste Management, inspected the above installation. The fition report shall serve a formal notification of any violations we be discovered upon examination of the results of laboratory at tion may be forthcoming, concerning any violations indicated This report does not constitute an order or other appealable. | gulations. Please use the compliance requirement intative of the Department indings of this inspection which were observed durallyses and review of Ed herein and listing any ple action of the Department. | That the control of t |

deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) | Date 7/15/93 |
|--------------------------------|--------------|
| Inspector (signature)          | Date 7/15/83 |
|                                | Page 4 of 4  |

### Pennsylvania Department of Environmental Resources Bureau of Waste Management

### Hazardous Waste Inspection Report Transporters — Part A

| Date of inspection  |
|---|
| Name of inspector Roger Savage  |
| Name of inspector Roger Savage  Company name Trustees of the University of Pennsylvania |
| Location 345/ Walnut St. , Phila, PA 19/04  |
| County Phila. Municipality Phila-   |
| Identification number PADO422507/Z  |
| Name of responsible official Kyle Rosato  |
| Title Industrial Alexanist  |
| Mailing address OF HS /1408 Blockley Aall, Phila, PA 19109                              |
| Area code and telephone number $(215)998-4453$  |
| Name of person interviewed Kylz Rosato  |
| Title Gane  |
| Mailing address (if different from above) Same  |
| Area code and telephone number  |
| 1. a. Pa hazardous waste transporter (HWT) license number <u>PA-AH 5 192</u>            |
| b. Expiration date $03-3/-94$   |
| 2. Hazardous waste handling: 🗷 N/A  |
| a. 🗆 Blending, 🗆 Mixing   |
| b. 🗆 Storage, 🗆 Treatment 🗆 Disposal  |
| c. 🗆 Use, 🗆 Reuse 🗆 Recycle 🗆 Reclaim   |
| 3. Does the transporter generate hazardous wastes?   Yes  No                            |
| 4. Types of hazardous waste produced by Hazardous Waste Number:                         |
| E. A. a hazardana markata Annonestad into the Commonwealth from phased?                 |

5. Are hazardous wastes transported into the Commonwealth from abroad?  $\Box$  Yes  $\nearrow$  No

### Pennsylvania Department of Environmental Resources Bureau of Waste Management

# Hazardous Waste Inspection Report Transporters — Part $\mathbf{B}^{\mathsf{L}}$

|          |      |    |   | ation Observed 2—Not Applicable 3—Not Determined 4—Non-Compli  | Chapter      |  |  |  |  |
|----------|------|----|---|--|--------------|--|--|--|--|
|          | Stat | us |   | REQUIREMENT  |              |  |  |  |  |
| 1        | 2    | 3  | 4 |  | 75.263       |  |  |  |  |
| X        |      |    |   | Identification number  | (b)          |  |  |  |  |
| X        |      |    |   | Company licensed by PA DER.  | (c)          |  |  |  |  |
|          |      |    |   | Copy of license kept on vehicles transporting hazaradous wastes.   | (c)(8)(iv)   |  |  |  |  |
|          |      |    |   | Licensee transporting only wastes conditioned on the license.  | (d)          |  |  |  |  |
| <b>X</b> |      |    |   | Manifest accompanies all shipments. **   | (d)          |  |  |  |  |
|          |      |    |   | Required number of copies of the manifest accompanies shipment.  | (d)(9)(i)    |  |  |  |  |
| 7        |      |    |   | Shipments comply with U.S. and PA DOT requirements.  | (d)(9)(ii)   |  |  |  |  |
| r        |      |    |   | Entire quantity, as stated on the manifest, delivered. 🗡   | (d)(9)(iii)  |  |  |  |  |
|          |      |    |   | Undeliverable shipment precedures following.   | (d)(10)      |  |  |  |  |
| ŶΪ       |      |    |   | Normal in-transit storage of waste (only if specified on the manifest).                                  | (e)(2)       |  |  |  |  |
|          |      |    |   | Records retained at designated location.   | (f)          |  |  |  |  |
|          |      |    |   | Contingency plan approved and implemented.   | (g)(6)       |  |  |  |  |
| 7        |      |    |   | Appropriate and adequate safety equipment carried on transport vehicle.                                  | (h)(2)       |  |  |  |  |
|          |      |    |   | Equipment decontamination procedures followed.   | (h)(3)       |  |  |  |  |
| 7        |      |    |   | Contaminated washwater, waste solutions, residues disposed of in accordance with regulations.            | (h)(3)       |  |  |  |  |
|          |      |    |   | Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less. | (h)(4)       |  |  |  |  |
|          |      |    |   | * for the purposes of this inspection "manifest" will mean the facili- modified Hazardous waste mani     | 'en,<br>AV'5 |  |  |  |  |
| -        |      |    |   | modified Hazardous waste mani<br>(see attached)  | fest.        |  |  |  |  |
|          |      |    |   |  |              |  |  |  |  |
|          |      |    |   |  |              |  |  |  |  |
| $\perp$  |      |    | _ |  | <del> </del> |  |  |  |  |

### Commonwealth of Peansylvania Department of Environmental Resources Bureau of Weste Management

### **Inspection Report Comments**

| Date of Inspection 1/15/93 Identification Number PA-AH 5/92  Company/Facility/Site Name University of Pennsylvania |
|--|
| Company/Facility/Site Name University of Pennsylvania  |
| Permission to conduct a reatine  |
| transporter inspection was given by  |
|  |
| The University of Pennsylvania presently generates hazardous waste at various                                      |
| generates hazardous waste at various   |
| sites within the campus. The waste   |
| is transported from the various  |
| locations on campus to the Consolidates  |
| Waste Facility which is also on Campus.  |
| The transporter must drive on public   |
| roads in order to transport waste  |
| from the point of generation to the  |
| Consolidated Waste Facility. A modified  |
| manifest is used in lieu of a PA state   |
| manifegt.  |
| The Department may waive the   |
| manifesting requirements in this   |
| particular situation.  |
| manifesting requirements in this particular situation. No violations observed.                                     |
|  |
|  |

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) | Date 7/15/23    |
|--------------------------------|-----------------|
| Inspector (signature)          | Date 7/15/43    |
|                                | Page _ 3 of _ 3 |

Lab Pack Chemicals **Internal Waste Manifest:** 

EPA Generator ID #: PAD042250712

Trustees of the University of Pennsylvania OEHS/ 1408 Blockley Hall Generator Name & Mailing Address:

Philadelphia PA 19104-6021

Generator Phone & Contact: (215) 898-4453

Kyle Rosato or Matthew D. Finucane, Director

PA Small Handler's Permit Number: **Designated Storage Facility Location:**  PAAHS192

University of Pennsylvania Consolidated Waste Facility

401 Guardian Drive, Philadelphia PA Date:\_

| Tag No. | Bldg ( | Code | Room | Quant | Unit | P.I. | Extension | Compound    | Location |
|---------|--------|------|------|-------|------|------|-----------|-------------|----------|
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           | <del></del> |          |
|         | -      |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       | ļ    |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             |          |
|         |        |      |      |       |      |      |           |             | -        |
|         |        |      |      |       |      |      |           |             | •        |

**Internal Waste Manifest:** 

EPA Generator ID #:

PAD042250712

Generator Name & Mailing Address:

Trustees of the University of Pennsylvania

**Mixed Waste Chemicals** 

OEHS/ 1408 Blockley Hall Philadelphia PA 19104-6021

Generator Phone & Contact:

(215) 898-4453

Kyle Rosato or Matthew D. Finucane, Director

PA Small Handler's Permit Number:

PAAHS192

Designated Storage Facility Location:

University of Pennsylvania Consolidated Waste Facility

401 Guardian Drive, Philadelphia PA

| Number | Date | Bldg. | Room |
|--------|------|-------|------|
| Quant. | Unit | P.I.  | Ext. |

| Compound            | 1 | Qty. | Compound             | 1 | Qty. | Compound | Qty. |
|---------------------|---|------|----------------------|---|------|----------|------|
| Acetone             |   |      | Methylene Chloride   |   |      |          |      |
| Acetonitrile        |   |      | N-Methylimidazole    |   |      |          |      |
| Chloroform          |   |      | N-Methylpyrrolidone  |   |      |          |      |
| Dichloroacetic Acid |   |      | Tetrazole            |   |      |          |      |
| Ethanol             |   |      | Toluene              |   |      |          |      |
| Ethyl Acetate       |   |      | Trifluoroacetic Acid |   |      |          |      |
| Hexane              |   |      | Water                |   |      |          |      |
| Methanol            |   |      | Xylene               |   |      |          |      |
| Location:           |   |      |                      |   |      |          |      |

| Number | Date | Bldg. | Room |
|--------|------|-------|------|
| Quant. | Unit | P.I.  | Ext. |

| Compound            | \ \ | Qty. | Compound             | √ | Qty. | Compound | Qty. |
|---------------------|-----|------|----------------------|---|------|----------|------|
| Acetone             |     |      | Methylene Chloride   |   |      |          |      |
| Acetonitrile        |     |      | N-Methylimidazole    |   |      |          |      |
| Chloroform          |     |      | N-Methylpyrrolidone  |   |      |          |      |
| Dichloroacetic Acid |     |      | Tetrazole            |   |      |          |      |
| Ethanol             |     |      | Toluene              |   |      |          |      |
| Ethyl Acetate       |     |      | Trifluoroacetic Acid |   |      |          |      |
| Hexane              |     |      | Water                |   |      |          |      |
| Methanol            |     |      | Xylene               |   |      |          |      |
| Location:           |     |      |                      |   |      |          |      |

#### Pennsylvania Department of Environmental Recources Burners of Waste Management

## Hazardous Waste Inspection Report Generators — Part A

| Date of inspection .  | 3/25/93                | Time start <u>913</u> | Ca pa Tin              | ne finish 12:30 pm                                     |
|-----------------------|------------------------|-----------------------|------------------------|--|
| Name of inspector _   | Rogerhava              | ul .                  |                        | /  |
| Company, installation | name Universi          | H of Per              | ingylvania             |  |
|                       | 1 Walnut &             |                       |                        | 19/04  |
| County Phil           |                        | ,                     | ipality Phila          | , City   |
|                       | PAD0422                |                       |                        | /  |
|                       | official Kyle          |                       |                        |  |
| Title Indu            | , , ,                  | menist                |                        |  |
|                       | FORD OF HS             | //                    | Blackley               | Hg/1, Phila PA 19                                      |
|                       | none number $(2/5)$    | <b>\</b>              | 7                      | 6  |
|                       | rviewed Kyle K         |                       |                        |  |
| Title Indu            |                        |                       |                        |  |
|                       | ifferent from above) 5 | ane                   |                        |  |
|                       | none number            | _                     |                        |  |
| ·                     | •                      |                       |                        |  |
| 1. Current waste ha   | indling method:        |                       |                        |  |
| a. 🗆 On-s             | site 🗆 treatment,      | ☐ storage,            | ☐ disposal             | □ PBR  |
| b. 🗆 On-s             | site 🗆 use,            | ☐ reuse,              | recycle,               | ☐ reclaim  |
| c. 💢 Off-             | site 🗆 treatment,      | storage,              | <b>点</b> disposal      |  |
| d. 💆 Off-             | site 🗆 use,            | ☐ reuse,              | 🖾 recycle,             | # reclaim  |
| 2 Amount of hazarr    | tous waste produced:   |                       | 4 Hg                   | Gfuelbland   |
| a                     | ~ 27                   | 00 kg./               | mo.                    |  |
| b                     | 35                     | 000 kg./              |                        |  |
| 2. Turns of bounds    |                        | andere Marta Num      | has and doctination fo | aility (include leasting and tune)                     |
| Waste Number          |                        | nation Facility       | per and destination ra | cility (include location and type).  Location and Type |
| Too many              | Clean A                | arbors                | Natio                  | K, MA  |
| 70 list               | Clean H                | arbors                | Baltin                 | nore, MD   |
|                       | Conneticut             | Treatment             | Corp. Com              | neticut 1  |
| <del></del>           | Clear Ha               | rbors                 | " Brain                | tree, MIA  |
|                       |                        |                       |                        |  |
|                       |                        |                       |                        |  |
| A.                    |                        |                       |                        |  |
|                       |                        |                       |                        |  |

6EN

# Hazardous Waste Inspection Report Generators — Part B

|        |        |             |   |  | Chapter    |
|--------|--------|-------------|---|--|------------|
|        | St     | atus        |   | REQUIREMENT  | Citation   |
| 1      | 2      | 3           | 4 |  | 262        |
| X      |        |             |   | Hazardous wasta determination, copies available                                | .11        |
| V      |        |             |   | Identification number  | .12(a      |
| X      |        |             |   | Hazardous waste shipments offered only to licensed transporters                | .12(d      |
| 7      |        |             |   | Authorization received from TSD facility for wastes shipped off-site           | .13        |
| Υ      |        |             |   | PA manifest used for intrastate shipments                                      | .20(b      |
| 7      |        |             |   | Disposer state manifest or EPA format manifest used for out-of-state shipments | .20(c      |
| ŶĬ     |        |             |   | Manifests filled out properly and completely                                   | .20(g)     |
| χT     |        |             |   | Manifests routed properly and within time limits (7 days)                      | .23(e)or(  |
| $\top$ |        |             | X | Proper U.S. DOT shipping containers or packages                                | .30(1)     |
| T      |        |             | X | Shipping containers marked and labeled according to U.S. DOT                   | .30(2)     |
| $\top$ |        |             | X | Containers of 110 gal. or less marked with required PA label                   | .30(3)     |
| T      |        | X           |   | Placards offered to transporter .  | .33        |
| 7      |        | <del></del> |   | Westes accumulated on-site for less than 90 days                               | .34(1)     |
| T      |        |             | X | Wastes stored in proper containers and properly marked and labeled             | .34(2)     |
|        |        |             | X | Containers managed in accordance with 265.171177                               | .34(3)     |
|        |        |             | X | Containers clearly marked with accumulation date and visible for inspection    | .34(4)     |
| 1      |        |             |   | Records retained at designated location for 20 years                           | .40        |
| 1      |        |             |   | Quarterly reports submitted to the Department                                  | .41        |
| 1      |        |             |   | Exception reporting procedures followed  | .42        |
| T      | X      |             |   | Hazardous waste disposal plan, if required                                     | .45        |
| 1      |        |             |   | Spill reporting procedures followed  | .46(a)     |
|        | $\neg$ |             | . | Preparedness, Prevention and Contingency Plan and implemented                  | .46(e)     |
|        | $\Box$ |             |   | Special requirements followed for international shipments                      | 50.53.55.6 |
| T      |        |             |   | On the job or classroom personnel training program 265.16                      | .34(a)(5   |
|        |        |             |   | Drum accumulation area inspected weekly as per 265.174                         | .34(a)(3   |
| Γ      | T      |             |   |  |            |
| Γ      |        |             |   |  |            |
|        | T      |             |   |  |            |

Z of 5
Recycled Paper

#### Bureau of Waste Management

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

|        |          |         | 1.N | o Violation Observed 2-Not Applicable 3-Not Determined 4-Nor   | -Compliance                |
|--------|----------|---------|-----|--|----------------------------|
|        | Status   |         | ,   | REQUIREMENT  | Clation<br>40 CFR          |
| 1      | 2        | 3       | 4   |  | Part 288                   |
| _      | <u> </u> | _       |     | Generators   |                            |
|        |          |         |     | Notification sent with shipments of wastes that do not meet treatment standards.   | 7(4)(1)                    |
| Y<br>Y |          |         |     | Notification and certification sent with shipments of wastes meeting treatment standards   | . 7(a)(2)                  |
| Y      |          |         |     | Dilution not used as a substitute for treatment.   | 3                          |
|        |          |         |     | Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification. | 7(a)(5), (a)(              |
|        | X        |         |     | Storage Facilities   |                            |
|        |          |         |     | Facility verifies generators classification of waste in accordence with waste analysis plan.   | 25 Pa Code<br>265.13(c)    |
|        | $\prod$  |         |     | Containers marked to identify contents and accumulation date.  | 50(a)(2)                   |
| I      |          |         |     | Notification sent with shipments of wastes that do not meet treatment standards.   | 7(a)(1)                    |
|        |          |         |     | Notification and certification sent with shipments of wastes meeting treatment standards.  | 7(a)(2)                    |
|        |          |         |     | acility maintains records of documents produced pursuant to LDR requirements.  | . 7(a)(6)                  |
|        |          |         | Ji  | reatment Facilities, including PBR and RRR Facilities  |                            |
|        |          | $\perp$ | C   | Pilution not used as a substitute for treatment.   | 3                          |
|        |          |         | F   | acility tests wastes or treatment residues to determine compliance with applicable estment standards in accordance with waste analysis plan. | 7(b)                       |
|        |          |         | C   | entification and/or notification sent with shipments of waste.   | 7(b)(4), (b)(5),<br>(b)(6) |
|        |          |         | L   | and Disposal Facilities  |                            |
|        |          |         | F   | scility tests wastes received to assure compliance with applicable treatment standards.  | 7(c)(2)                    |
|        |          |         | F   | icility land disposes of restricted waste only if it meets applicable treatment standard.  | 40                         |
| A      |          |         | F   | city retains copies of generator notifications and certifications.   | 7(c)(1)                    |

To the state of th

## Commonweith of Pennsylvania Department of Environmental Resources Bureau of Wasta Management

### **Inspection Report Comments**

| Date of Inspection 3/25/93 Identification Number PADO422507/2  Company/Facility/Site Name University of Pennsylvania  |
|---|
| Company/Facility/Site Name University of Vennsy/vania   |
| Permission to conduct an inspection was given   |
| DV Byle Kosato.   |
| Waste is generated primarily from   |
| Inhoratory facilities and engineering facilities.   |
| Waste is generated primarily from laboratory facilities and engineering facilities. Hazardous waste was being stored in the   |
| Consolidate Vagte Facility and in the outdoor   |
| confainment units. The waste stored   |
| inside the Consolidate Waste Facility was   |
| not within a containment area. One  |
| drum inside the building was not labeled and  |
| marked with an accumulation date. Wastes  |
| stored on shelves were without accumulation   |
| dates and not within containers.  |
| At least three drums within the Hazardous   |
| waste containment units were not marked   |
| with accumulation dates.  |
| The storage grea in side the building should  |
| be labeled as a hazardous waste storge area   |
| to warn unknowing persons,  |
|   |
| In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.  This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be |

deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) | 156 | Host | D       | ate          |
|--------------------------------|-----|------|---------|--------------|
| Inspector (signature)          | 2   | ul)  | <u></u> | ate 3/25/93  |
| inspector (signature)          |     |      |         | Page 14 of 5 |



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

FIELD OPERATIONS - WASTE MANAGEMENT Suite 6010 Lee Park 555 North Lane Conshohocken, PA 19428

March 30, 1993

Certified Mail:

Kyle A. Rosato University of Pennsylvania Office of Environmental Health an Safety 1408 Blockley Hall Philadelphia, PA 19104-6021

Re: Hazardous Waste Inspection
March 25, 1993 PADO422507/2
City of Philadelphia
Philadelphia County

#### NOTICE OF VIOLATION

Dear Mr. Rosato:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

\$262.34.(a)(2). Accumulation. A generator may accumulate a hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packing, marking, and labeling requirements in \$\$262.30 and 262.33.

Wastes stored on shelves in the Consolidate Waste Facility were not placed in containers meeting the requirements of \$262.34.

\$262.34.(a)(3). Accumulation. A generator may accumulate hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with Chapter 265 Subchapter I.

The wastes stored in the Consolidate Waste Facility were not within a secondary containment area meeting the requirements of Chapter 265 Subchapter I.

\$262.34.(a)(4). Accumulation. A generator may accumulate hazardous waste onsite without a permit for 90 days or less if on each container, each date on which any hazardous waste was placed in the container shall be clearly marked and visible for inspection.

### Commonwealth of Pennsylvania Department of Environmental Resources Bereau of Waste Management

### **Inspection Report Comments**

| Date of Inspection       | 3/25/93                                  | Identification Number      | PADO42250712                            |
|--------------------------|--|----------------------------|---|
| Company/Facility/Site Na | me Universit                             | of Pen                     | ngylvania                               |
| Contai                   | ners should                              | he arrar                   | ged so that                             |
| the labe                 | els can be c                             | 15 ily re                  | ad.                                     |
| The U                    | versity of Pen                           | nsylvan                    | ia has a                                |
| small he                 | andler's haza                            | rdous u                    | aste transforter                        |
|                          | (PAAHS19Z). The                          |                            |   |
| waste -                  | through-out +A                           | ie campo                   | 45. Mr. Fosato                          |
| stated ;                 | that the live                            | ense is                    | not used                                |
| to tran                  | sport wast                               | e +0 q                     | TSD facility.                           |
|                          |  |                            |   |
|                          |  |                            |   |
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| - Di                     |  |                            |   |
| - IM                     |  |                            |   |
|                          |  |                            |   |
|                          |  |                            |   |
| In the "Requirer         | ment" Section of this inspection report. | , each listed inspection i | tem may provide only a brief version of |

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature)  | Date 3/25/93              |
|---|---------------------------|
| Inspector (signature)   | Date 3/25/45              |
| The second control of | Page <b>5</b> of <b>5</b> |

Mr. Rosato March 30, 1993 Page 2

One metal drum containing hazardous waste oil and wastes stored on shelves and in the cabinet, all of which were located in the Consolidate Waste Facility, were without accumulation dates. At least three drums in the hazardous waste containment units were without accumulation dates. The labels on many of the drums in the hazardous waste containment units were not clearly visible for inspection.

Each listed violation item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this notice as a reference to obtain a detailed description of compliance requirements.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at (215) 832-6212.

Sincerely yours,

ROGER L. SAVAGE

Waste Management Specialist

cc: Regional Compliance

> EPA C.O.

MAY . 3 1093

### Penasylvania Department of Environmental Resources Bureau of Waste Management

## Hazardous Waste Inspection Report Generators — Part A

| Date of inspection $\frac{5/4/9.3}{2.150}$ Time start $\frac{1145pm}{2.150}$ Time finish $\frac{2150}{2.150}$   |
|---|
| Name of inspector Roger Savage  |
| Company, installation name Whiversity of Rennsylvania   |
| Location 3451, Walnut St., Phila, PA 19104  |
| County Thila. Municipality Thila.   |
| Identification number PADO422507/2  |
| Name of responsible official Kyle Kosato  |
| Title Industrial Hygenist   |
| Mailing address OEHS/1406 Blockley Hall, Phila, PA 19104-0  |
| Area code and telephone number (715) 898-4453   |
| Name of person interviewed <u>Sank</u>  |
| Title Sand  |
| Mailing address (if different from above)   |
| Area code and telephone number <u>Senale</u>  |
|   |
| 1. Current waste handling method:   |
| a. 🗆 On-site 🗆 treatment, 🗀 storage, 🗀 disposal 🗆 PBR   |
| b. 🗆 On-site 🗆 use, 🗎 reuse, 🗀 recycle, 🗀 reclaim   |
| c. 以 Off-site   |
| d. 🖊 Off-site 🗆 use, 🗆 reuse, 💢 recycle, 💢 reclaim  |
| 2. Amount of hazardous waste produced:  |
| a kg./mo.   |
| b kg./yr.   |
|   |
| 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).  Waste Number Destination Facility Location and Type |
| Too many Clean Harbors Natick, MA   |
| to list Clean Harbors Baltimore, MR   |
| 1 Constigut Treatment Corp. Connecticut   |
| Clogo Harbors Braintree MA  |
|   |
|   |
|   |
| Y   |

# Hazardous Waste Inspection Report Generators — Part B

|           |   | 1-1      | te Vic    | olation Observed 2—Net Applicable 3—Net Determined 4—No                        | on-Compliance       |
|-----------|---|----------|-----------|--|---------------------|
|           | · | atus     |           | REQUIREMENT  | Chapter<br>Citation |
| 1         | 2 | 3        | 4         | U  | 262                 |
| 1         | ļ |          |           | Hazardous waste determination, copies available                                | .11                 |
| X         |   |          |           | Identification number  | .12(a)              |
|           |   | X        |           | Hazardous waste shipments offered only to licensed transporters                | .12(d)              |
|           |   | X        |           | Authorization received from TSD facility for wastes shipped off-site           | .13                 |
|           |   | X        |           | PA manifest used for intrastate shipments                                      | .20(b)              |
|           |   | X        |           | Disposer state manifest or EPA format manifest used for out-of-state shipments | ,20(c)              |
|           |   | X        |           | Manifests filled out properly and completely                                   | .20(g)              |
|           |   | X        |           | Manifests routed properly and within time limits (7 days)                      | .23(e)or(f          |
| X         |   |          |           | Proper U.S. DOT shipping containers or packages                                | .30(1)              |
| $\hat{x}$ |   |          |           | Shipping containers marked and labeled according to U.S. DGT                   |                     |
| - 1- 1    |   |          |           | Containers of 110 gal. or less marked with required PA label                   | .30(2)              |
| K         | _ | V        |           | Placards offered to transporter .  | .33                 |
| 7         |   | $\Delta$ |           | Wastes accumulated on-site for less than 90 days                               | .34(1)              |
| $\geq$    |   |          | +         | Wastes stored in proper containers and properly marked and labeled             | .34(2)              |
|           |   |          |           | Containers managed in accordance with 265.171177                               | .34(3)              |
| Ħ         |   |          |           | Containers clearly marked with accumulation date and visible for inspection    | .34(4)              |
| 1         |   | X        |           | Records retained at designated location for 20 years                           | .40                 |
| 寸         |   | X        |           | Quarterly reports submitted to the Department                                  | .41                 |
| $\top$    |   | V        | 7         | Exception reporting procedures followed  | .42                 |
| $\top$    | X |          |           | Hazardous waste disposal plan, if required                                     | .45                 |
| 7         |   |          |           | Spill reporting procedures followed  | .46(a)              |
| 1         |   | X        | .         | Preparedness, Prevention and Contingency Plan and implemented                  | .46(e)              |
| 7         |   | X        |           | Special requirements followed for international shipments                      | 50.53.55.60         |
| 1         |   | X        | $\exists$ | On the job or classroom personnel training program 265.16                      | .34(a)(5)           |
| 7         | Ť |          |           | Drum accumulation area inspected weekly as per 265.174                         | .34(a)(3)           |
|           | _ |          |           |  |                     |
|           |   |          |           |  |                     |
| T         |   |          |           |  |                     |
| T         |   |          |           | ·  |                     |

Z of 4 Recycled Paper

#### Participh with Department of Emit primerial Percurcial Bureou of Wairs Management

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

|                |    |        | 1.1 | lo Violation Observed 2-Not Applicable 3-Not Determined   | 4-Non-Compliance                  |
|----------------|----|--------|-----|---|-----------------------------------|
| Status 1 2 3 4 |    |        |     | REQUIREMENT   | Ctation<br>40 CFR<br>Part 268     |
|                | -  | +      | +   | Generators  | 72.1.200                          |
|                |    | $\chi$ | 1   | Notification sent with shipments of wastes that do not meet treatment standard  | s. 7(a)(1)                        |
| _              |    | X      | 1   | Notification and certification sent with shipments of wastes meeting treatment st   | andards. 7(a)(2)                  |
|                |    | Y      | T   | Dilution not used as a substitute for treatment.  | 3                                 |
|                |    | X      |     | Records maintained of notifications, certifications, waste analysis, and document supporting use of knowledge for waste classification. | mentation 7(a)(5), (a)(           |
|                |    | V      |     | Storage Facilities  |                                   |
|                |    | T      |     | Facility verifies generators classification of waste in accordence with waste analyst   | sis plan. 25 Pa Code<br>265.13(c) |
| 1              |    | T      |     | Containers marked to identify contents and accumulation date.   | 50(a)(2)                          |
| 1              |    |        |     | Notification sent with shipments of wastes that do not meet treatment standards.  | . 7(a)(1)                         |
| 1              |    |        |     | Notification and certification sent with shipments of wastes meeting treatment sta  | Indards. 7(a)(2)                  |
| T              |    | П      |     | Facility maintains records of documents produced pursuant to LDR requirements.  | . 7(a)(6)                         |
| T              | T  | П      |     | Treatment Facilities, including PBR and RRR Facilities  |                                   |
| T              |    |        |     | Dilution not used as a substitute for treatment.  | 3                                 |
|                |    |        |     | Facility tests wastes or treatment residues to determine compliance with ap treatment standards in accordance with waste analysis plan. | opticable 7(b)                    |
|                |    |        |     | Certification and/or notification sent with shipments of waste.   | 7(b)(4), (b)(5),<br>(b)(6)        |
| I              |    |        |     | Land Disposal Facilities  |                                   |
| Ï              |    |        | 1   | Facility tests wastes received to assure compliance with applicable treatment stan  | ndards. 7(c)(2)                   |
| Γ              |    | 1      |     | Facility land disposes of restricted waste only if it meets applicable treatment stand  | lard. 40                          |
| Γ              | 10 | П      |     | acility retains copies of generator notifications and certifications.   | 7(c)(1)                           |

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7 of 4

#### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

### **Inspection Report Comments**

| Date of Inspection $\frac{5/4/93}{}$                | Identification Number           | PAD0422507/Z                           |
|---|---------------------------------|--|
| Company/Facility/Site Name Mainersity               | of Jannay                       | vania                                  |
| Permission to cons                                  | Just 9 folk                     |  |
| was given by tiple 1                                | Rosafo.                         |  |
| All violations noted                                |                                 | 3/25/93 inspection                     |
| have been correct                                   |                                 | '                                      |
| A secondary contain                                 | ment has b                      | been installed                         |
| in the Consolidated I                               | lastetac                        | ility and the                          |
| floor has been sea                                  | rled.                           |  |
| No violations we                                    | re obse                         | rved.                                  |
|   |                                 |  |
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| ·   |                                 |  |
|   |                                 |  |
|   | <u> </u>                        | 215 T-444                              |
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| In the "Requirement" Section of this inspection rep | port, each listed inspection it | em may provide only a brief version of |

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

| Person Interviewed (signature) | Date 5-/4/53 |
|--------------------------------|--------------|
| Inspector (signature)          | Date 5/4/13  |
|                                | Page 4 of 4  |